

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BRUCE E. KATZ, M.D., P.C., d/b/a :
Juva Skin and Laser Center, individually :
and on behalf of all others similarly situated, :

Plaintiff, :

vs. :

FOCUS FORWARD LLC, :

Defendant. :

CIVIL ACTION NO. 1:20-cv-02897-PAC

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendant Focus Forward, LLC (“Focus Forward”) will move this Court before the Honorable Paul A. Crotty, United States District Court Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order dismissing the Complaint filed by Plaintiff Bruce E. Katz, M.D., P.C. d/b/a Juva Skin and Laser Center (“Plaintiff”) with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and granting all other relief that this Court deems just and proper.

This Motion is based on this Notice of Motion and the accompanying Memorandum of Law as well as the pleadings and other documents filed in this action.

PLEASE TAKE FURTHER NOTICE that Plaintiff's opposition shall be served on or before October 2, 2020 and Focus Forward's reply shall be served on or before October 9, 2020.

Dated: Philadelphia, PA
September 11, 2020

Respectfully submitted,

/s/ Samantha L. Southall

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CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2020, I caused to be electronically filed the foregoing document with the Clerk of the Court via CM/ECF. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing systems. Parties may access the filing through the Court's CM/ECF System.

/s/ Samantha L. Southall
Samantha L. Southall